

**Lawrence D. Mandel
Gertner Mandel, LLC
P.O. Box 301
Lakewood, New Jersey 08701
(732) 363-3333
Fax (732) 534-0328
Attorneys for Plaintiff**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ARYEH GRUNEWALD,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO. _____
v.	:	
	:	COMPLAINT AND JURY DEMAND
GOOGLE, INC., PRINTAWORLD,	:	
JERRY LIU, RAYMOND WANG,	:	
BEST ON EAGLE, LLC,	:	
SHMUEL FRUCHTER A/K/A SAM	:	
FRUCHTER, and BARRY JUMPITA,	:	
	:	
Defendants.	:	
	:	

ARYEH GRUNEWALD, by his attorneys, Gertner Mandel, LLC, for his complaint against, GOOGLE, INC., PRINTAWORLD, JERRY LIU, RAYMOND WANG, BEST ON EAGLE, LLC, SHMUEL FRUCHTER A/K/A SAM FRUCHTER, and BARRY JUMPITA, hereby alleges as follows:

1. Plaintiff, ARYEH GRUNEWALD, is an individual, with an address at 219 White Road, Jackson, New Jersey 08527.
2. Upon information and belief, Defendant PRINTAWORLD is a business entity, with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

3. . Upon information and belief, Defendant JERRY LIU ("Liu"), is an owner of Defendant PRINTAWORLD and/or is doing business as PRINTAWORLD and is an individual with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

4. Upon information and belief, Defendant RAYMOND WANG ("Wang"), is an owner of Defendant PRINTAWORLD and/or is doing business as PRINTAWORLD and is an individual with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

5. Upon information and belief, Defendant BEST ON EAGLE, LLC ("Best On Eagle"), is a New York Limited Liability Company with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

6. Upon information and belief, Defendant SHMUEL FRUCHTER A/K/A SAM FRUCHTER is an owner of Best on Eagle and/or is doing business as Best on Eagle and is an individual with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

7. Upon information and belief, Defendant BARRY JUMPITA, is an employee of Defendant Best On Eagle with an address at 394 McGuinness Boulevard, Brooklyn, New York 11222.

8. Upon information and belief, Defendant GOOGLE, INC., is a Delaware Corporation with an address at 1600 Amphitheatre Parkway, Mountain View, California 94043.

JURISDICTION AND VENUE

9. This is a civil action arising under the copyright laws of the United States, 17 U.S.C. §101 et seq. and is for the infringement of a copyright registered in the United States Copyright Office. This Court has jurisdiction over the subject matter of this claim pursuant to 28 U.S.C. §1331 and §1338(a). Defendants are residing in this judicial district and/or are

transacting and doing business within this judicial district; have contracted to supply goods and/or services into this judicial district; have committed the acts complained of herein within this judicial district and regularly do or solicit business or engage in a persistent course of conduct or derive substantial revenue from goods and/or services used or consumed within this judicial district and expect or should reasonably expect such acts to have consequences within this judicial district and derive substantial revenue from interstate commerce; and are subject to the jurisdiction of this Court, pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure. Venue is proper in this judicial district pursuant to 28 U.S.C. §1331 and §1400(a).

FACTS COMMON TO ALL CAUSES OF ACTION

10. In 2016, Plaintiff Aryeh Grunewald created and embodied in physical form an original work in a tangible medium of expression, to wit, a collection of sculptures entitled “Bandit Holding Heart.”

11. Plaintiff is the owner of the copyright in “Bandit Holding Heart” which copyright is covered by U.S. Copyright Registration No. VAu 1-261-184, a copy of which is attached hereto as Exhibit 1.

12. “Bandit Holding Heart” consists of material which is original and copyrightable subject matter under the copyright laws of the United States, 17 U.S.C. §101 *et seq.*

13. Plaintiff contracted with Defendants Printaworld, Liu, and Wang for 3-D printing and painting of Plaintiff’s works, among them, the sculptures in the collection “Bandit Holding Heart.”

14. Upon information and belief, Defendants Printaworld, Liu, and Wang retained the services of Defendants Best on Eagle, LLC and Shmuel Fruchter a/k/a Sam Fruchter to perform painting services in connection with the Plaintiff's sculptures in the collection "Bandit Holding Heart."

15. Upon information and belief, Defendant Barry Jumpita was working for Best on Eagle, LLC and Shmuel Fruchter a/k/a Sam Fruchter at all relevant times.

16. Barry Jumpita photographed the Plaintiff's sculptures which were being worked on at Best on Eagle, LLC and posted the photograph to Google Maps for the location 394 McGuinness Boulevard, Brooklyn, New York 11222. Exhibit 2 attached hereto is a photograph of a cell phone showing the photograph taken by Barry Jumpita and posted to Google Maps.

17. Each time a person types the address 394 McGuinness Boulevard, Brooklyn, New York 11222 in Google Maps, the photograph of Plaintiff's copyrighted works are shown on the screen as seen in Exhibit 3 attached hereto.

18. Demand has been made to Defendants Printaworld, Liu, Wang, and Jumpita to remove the photograph of Plaintiff's copyrighted works from Google Maps but these Defendants have refused to comply with Plaintiff's demand.

19. A proper statutory notice (the "Notice") was submitted to Defendant Google, Inc. by Plaintiff's authorized representative pursuant to the Digital Millennium Copyright Act and Google, Inc.'s posted on-line instructions whereby Google, Inc. was requested to remove the photograph of Plaintiff's copyrighted works from Google Maps. A copy of the Notice is attached hereto as Exhibit 4.

20. Google, Inc. has refused to honor the Plaintiff's request as shown in its response attached hereto as Exhibit 5.

21. Defendants have acted and continue to act with full knowledge of Plaintiff's rights and in complete disregard thereof.

COUNT I

COPYRIGHT INFRINGEMENT

22. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 21 hereof with the same force and effect as if set forth herein at length.

23. Defendants' acts alleged herein constitute violations of the exclusive rights of Plaintiff under 17 U.S.C. §106 and constitute infringement under 17 U.S.C. §501.

24. Defendants' acts alleged herein have been willful and intentional.

25. Defendants' acts alleged herein have been without the permission, license or consent of Plaintiff.

26. As a result of Defendants' actions, Plaintiff has suffered and will continue to suffer irreparable harm and damage to his business, including loss of reputation, as well as loss in sales in an amount not yet known.

27. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff prays for judgment that:

(a) Defendants and their officers, agents, servants, employees and attorneys and all those in active concert or participation with them, be preliminarily and permanently enjoined from infringing the copyrights of Plaintiff in any manner including but not limited to manufacturing, reproducing, displaying, publishing, vending, distributing, selling, promoting,

importing and/or advertising, or assisting, inducing or contributing to the manufacturing, reproducing, displaying, publishing, vending, distributing, selling, promoting, importing or advertising any copies of such works which are the subject of said copyrights.

(b) Defendants be required to deliver to Plaintiff for destruction, all infringing copies of the copyrighted works.

(c) Defendants be required to pay Plaintiff statutory damages or such actual damages as Plaintiff sustained in consequence of the infringement by Defendants of Plaintiff's copyrights, and to account for all gains, profits and advantages, with full cost and reasonable attorney's fees to be allowed to Plaintiff as provided in 17 U.S.C. §504 and §505, and, in the event statutory damages are awarded, that the award be increased due to the willful nature of Defendants' infringement.

(d) Plaintiff be granted such other and further relief as the Court may deem just and proper.

COUNT II
CONTRIBUTORY COPYRIGHT INFRINGEMENT

28. Plaintiff repeats and realleges the allegations of Paragraphs 1 through 27 hereof with the same force and effect as if set forth herein at length.

29. Defendant's acts alleged herein constitute contributory copyright infringement in that Defendants are aware that each time a person types the address 394 McGuinness Boulevard, Brooklyn, New York 11222 in Google Maps, the photograph of Plaintiff's copyrighted works are reproduced on that person's computer or other personal device, thus infringing Plaintiff's copyrights.

30. Defendants are, thus, contributing and inducing infringement of Plaintiff's copyrights many times every day.

31. Defendants' acts alleged herein have been willful and intentional.

32. Defendants' acts alleged herein have been without the permission, license or consent of Plaintiff.

33. As a result of Defendants' actions, Plaintiff has suffered and will continue to suffer irreparable harm and damage to his business, including loss of reputation, as well as loss in sales in an amount not yet known.

34. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff prays for judgment that:

(a) Defendants and their officers, agents, servants, employees and attorneys and all those in active concert or participation with them, be preliminarily and permanently enjoined from contributing to and inducing the infringement of the copyrights of Plaintiff in any manner including but not limited to manufacturing, reproducing, displaying, publishing, vending, distributing, selling, promoting, importing and/or advertising, or assisting, inducing or contributing to the manufacturing, reproducing, displaying, publishing, vending, distributing, selling, promoting, importing or advertising any copies of such works which are the subject of said copyrights.

(b) Defendants be required to deliver to Plaintiff for destruction, all infringing copies of the copyrighted works.

(c) Defendants be required to pay Plaintiff statutory damages or such actual damages as Plaintiff sustained in consequence of the contributory infringement by Defendants of

Plaintiff's copyrights, and to account for all gains, profits and advantages, with full cost and reasonable attorney's fees to be allowed to Plaintiff as provided in 17 U.S.C. §504 and §505, and, in the event statutory damages are awarded, that the award be increased due to the willful nature of Defendants' infringement.

(d) Plaintiff be granted such other and further relief as the Court may deem just and proper.

COUNT III
BREACH OF CONTRACT

35. This Count arises under the New York common law. Jurisdiction is supplemental to Count I pursuant to U.S.C. §1367. Venue is proper in this district under 28 U.S.C. §1391.

36. Plaintiff repeats and realleges the allegations of Paragraphs 1through 35 hereof with the same force and effect as if set forth herein at length.

37. Defendants Printaworld, Liu and Wang entered into a non-disclosure agreement with Plaintiff.

38. Defendants have breached the Agreement.

39. Defendants' failure to comply with the Agreement between the parties constitutes breach of contract.

40. Plaintiff has been damaged.

WHEREFORE, Plaintiff prays for judgment that:

(a) Defendants be required to pay Plaintiff any damages suffered by Plaintiff as a result of Defendants' actions in an amount to be proven with specificity at trial;

(b) Defendants be required to pay Plaintiff the costs of this action, together with reasonable attorney's fees, costs and disbursements; and

(c) Plaintiff be awarded such other and further relief as this Court deems just and equitable.

COUNT IV
NEGLIGANT BAILMENT

41. This Count arises under the New York common law. Jurisdiction is supplemental to Count I pursuant to U.S.C. §1367. Venue is proper in this district under 28 U.S.C. §1391.

42. Plaintiff repeats and realleges the allegations of Paragraphs 1through 41 hereof with the same force and effect as if set forth herein at length.

43. Defendants Printaworld, Liu, and Wang entered into an agreement with Plaintiff for services related to Plaintiff's copyrighted works.

44. Defendants had an obligation to safeguard Plaintiff's property in connection with their agreement.

45. Defendants acted with negligence when failing to properly safeguard Plaintiff's property.

46. Plaintiff has been damaged.

WHEREFORE, Plaintiff prays for judgment that:

(a) Defendants be required to pay Plaintiff any damages suffered by Plaintiff as a result of Defendants' actions in an amount to be proven with specificity at trial;

(b) Defendants be required to pay Plaintiff the costs of this action, together with reasonable attorney's fees, costs and disbursements; and

(c) Plaintiff be awarded such other and further relief as this Court deems just and equitable.

DEMAND FOR TRIAL BY JURY

Plaintiff demands trial by jury on all issues so triable in this matter.

GERTNER MANDEL, LLC

Dated: June 30, 2017

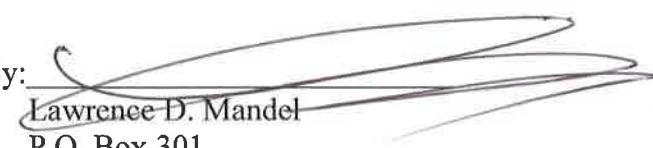
By: 
Lawrence D. Mandel
P.O. Box 301
Lakewood, NJ 08701
(732) 363-3333
Attorneys for Plaintiff

EXHIBIT 1

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Kayleigh Clayett".

Acting United States Register of Copyrights and Director

Registration Number

VAu 1-261-184

Effective Date of Registration:
August 10, 2016

Title

Title of Work: BANDIT HOLDING HEART

Completion/Publication

Year of Completion: 2016

Author

- **Author:** Aryeh Z Grunewald
- Author Created:** sculpture
- Work made for hire:** No
- Citizen of:** United States

Copyright Claimant

Copyright Claimant: Aryeh Z Grunewald
219 White Road, Jackson, NJ, 08527, United States

Rights and Permissions

Organization Name: Gertner Mandel, LLC
Name: Lawrence D Mandel
Email: lmandel@gmplaw.net
Telephone: (732)363-3333
Address: P.O. Box 499
Lakewood, NJ 08701 United States

Certification

Name: Lawrence D. Mandel
Date: August 10, 2016

Applicant's Tracking Number: 2343-01

Copyright Office notes: Basis for Registration: unpublished collection

EXHIBIT 2



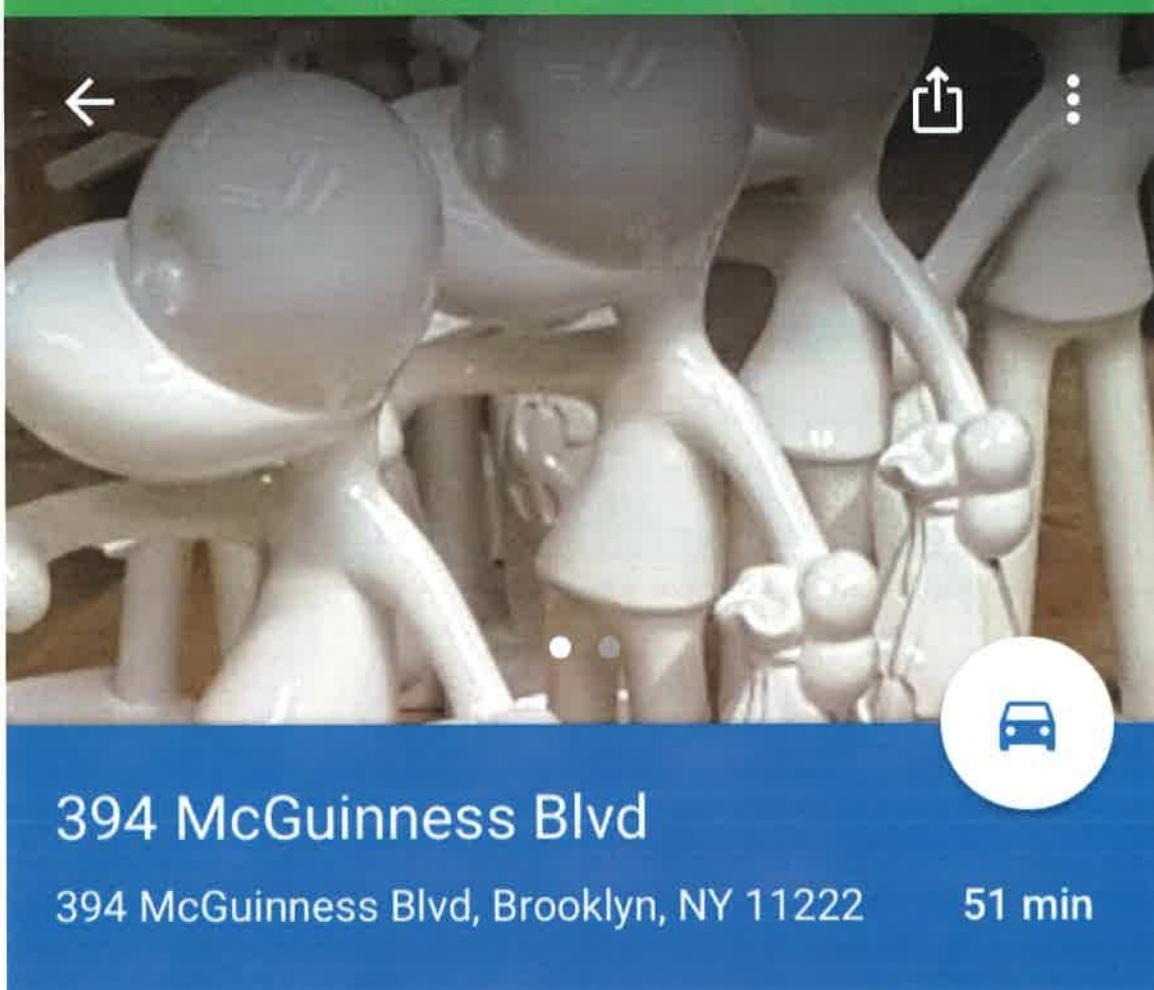
B

Barry Jumpita

Images may be subject to copyright.

EXHIBIT 3

Touch to return to call 01:46



At this address



2100built
Furniture Maker



Big Tech Laser
Cutting/Metal Plat...
Laser Cutting Service



Construct
LLC.
Woodworke
e n t a

EXHIBIT 4

Legal Help

LEGAL

Report alleged copyright infringement

Maps

It is our policy to respond to clear notices of alleged copyright infringement. This page describes the information that should be present in these notices. It is designed to make submitting notices of alleged infringement to Google as straightforward as possible while reducing the number of notices that we receive that are fraudulent or difficult to understand or verify. The form of notice specified below is consistent with the form suggested by the United States Digital Millennium Copyright Act (the text of which can be found at the U.S. Copyright Office Web Site, <http://www.copyright.gov>) but we will respond to notices of this form from other jurisdictions as well.

Regardless of whether we may be liable for such infringement under local country law or United States law, our response may include removing or disabling access to material claimed to be the subject of infringing activity and/or terminating subscribers. If we remove or disable access in response to such a notice, we may notify the owner or administrator of the affected site or content so that he or she can make a counter notification. It is also our policy to document all notices of alleged infringement we receive, including by sending a copy of the notice to one or more third parties or making it available to the public. You can see an example of such a publication at <http://www.lumendatabase.org/dmca512/notice.cgi?NoticeID=861>.

IMPORTANT: Misrepresentations made in your notice regarding whether material or activity is infringing may expose you to liability for damages (including costs and attorneys' fees). Courts have found that you must consider copyright defenses, limitations or exceptions before sending a notice. In one case involving online content, a company paid more than \$100,000 in costs and attorneys fees after targeting content protected by the U.S. fair use doctrine. Accordingly, if you are not sure whether material available online infringes your copyright, we suggest that you first contact an attorney.

Complainant's Information: Please provide us with information about yourself.

Contact Information

Name *

Enter your first and last names

Lawrence Mandel

Company name

Gertner Mandel, LLC

Full legal name of the copyright holder you represent (e.g., if you are a legal agent, etc.) *

Aryeh Grunewald

Contact email address *

(where confirmation email will be sent)

lmandel@gmplaw.net

Country of residence *

United States ▾

Your Copyrighted Work

(For example, "The photographs of the black widow spider with red spots and that of the black labrador retriever which can be viewed at the URL below" or "My published book, "Touch Not This Cat", is infringed by the text excerpted on the site, beginning with the text 'I came home to find my cat sitting on the kitchen counter.'")

Where can we see an authorized example of the work?

Please enter one item per line

Google Maps for 394 McGuinness Blvd, Brooklyn, NY 11222

Identify and describe the copyrighted work *

Photograph of copyrighted sculptures of figures holding money bags, all in white, which are part of registered collection known as "Bandit Holding Heart" under U.S. Copyright Certificate No. V Au 1-261-184

Allegedly Infringing Material

Identify the content on Google Maps that you claim is infringing; for example, if it is an image that you wish to have removed from our service, provide the exact URL for the image.

To find the exact URL of the image, please follow these steps:

- a. Click on the image you are reporting on the Google Maps business listing.
- b. Click on the URL that displays in your browser's address bar. If you are in a mobile app, please open the same content in your browser in order to copy the URL.
- c. Right-click and select "Copy."
- d. In your notice to us, right-click and select ""Paste"" to add the URL to your document.

Location of the allegedly infringing material * ?

<https://www.google.com/maps/place/394+McGuinness+Blvd,+Brooklyn,+NY+11222/@40.7365404,-73.95>

Add additional

Sworn Statements

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law. *

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed. *

Please check to confirm

Please note that a copy of each legal notice we receive is sent to a third-party which may publish and annotate it (with your personal information removed). As such, the content submitted in this form will be forwarded to Lumen (<http://www.lumendatabase.org>) for publication. You can see an example of such a publication at <http://www.lumendatabase.org/dmca512/notice.cgi?NoticeID=861>. For products like Google Web Search, a link to your published notice will be displayed in Google's search results in place of the removed content.

Signature

Signed on this date of

Tue, 04 Apr 2017

Signature

By typing your full name below, you are providing us with your digital signature, which is as legally binding as your physical signature. Your signature must exactly match the first and last names that you entered at the top of this web form in order for your submission to be successful.

/lawrence mandel/

Please note that we will not process your complaint if it isn't properly filled out or if the complaint is incomplete. If multiple Google products are affected, please note that you must submit a notice for each affected product. Instructions for filing a DMCA notice for each product can be found at <http://support.google.com/legal/answer/1120734> (refer to the sidebar on the left-hand side of the page).

Account Disabling

Many Google Services do not have account holders or subscribers. For Services that do, Google will, in appropriate circumstances, disable the accounts of repeat infringers. If you believe that an account holder or subscriber is a repeat infringer, please follow the instructions above to contact Google's DMCA agent and provide information sufficient for us to verify that the account holder or subscriber is a repeat infringer.

* Required field

EXHIBIT 5

Jamie Van Saders

From: removals@google.com
Sent: Wednesday, April 26, 2017 2:29 PM
To: Lawrence Mandel
Cc: 'Jamie Van Saders'
Subject: RE: [4-5586000017052] Your Request to Google

Hello,

Thanks for reaching out to us.

At this time, Google has decided not to take action. We encourage you to resolve any disputes directly with the individual who posted the content.

If you cannot reach an agreement and choose to pursue legal action against the individual who posted the content, and that action results in a judicial determination that the material is illegal or should be removed, please send us the court order seeking removal. If you would like to request identifying information about an anonymous poster, please contact google-legal-support@google.com (if you are in the U.S.) or internationalcivil@google.com (if you are outside of the U.S.) for more information on how to serve us with valid legal process.

Regards,
The Google Team

When replying to this message, please do not change the subject line. Doing so may prevent us from receiving your message, and will cause you to receive a "bounced" auto-response. If you receive that "bounce" response, please resend your message by replying to this original email without changing the subject line. If you still receive an auto-response, submit a new request through our forms at <https://support.google.com/legal>.

On 04/24/17 22:53:34 lmandel@gmplaw.net wrote:

The person who posted the unauthorized material secretly took a photograph with his phone of my client's copyrighted sculptures and then posted the photograph on Google Maps. The address is where he saw them. This person has acknowledged to me that he was not authorized to do that and he wishes the photograph to be removed as, obviously does my client. Please remove the photograph. Thank you.

Lawrence D. Mandel

Gertner Mandel, LLC

P.O. Box 301

Lakewood, NJ 08701

Tel: (732) 363-3333

Fax: (732) 534-0328

www.iplaw-gmp.net

From: removals@google.com [mailto:removals@google.com]
Sent: Monday, April 24, 2017 1:15 PM
To: Lawrence Mandel
Cc: Jamie Van Saders
Subject: RE: [4-5586000017052] Your Request to Google

Hello,

Thanks for reaching out to us.

Regarding the following URLs:

<https://www.google.com/maps/place/394+McGuinness+Bvd,+Brooklyn,+NY+11222/@40.7365404,-73.9544983,17z/data=!3m1!4b1!4m5!3m4!1s0x89c2593be62b034f:0x4934b645b2ac3f99!8m2!3d40.7365404!4d-73.9523096>

It is unclear to us what the copyright issue is. If you are the copyright holder for this content, please provide us with a link to the original source of the copyrighted work that you claim has been republished without your authorization. This will help us further investigate the issue and take the appropriate actions.

Regards,
The Google Team

When replying to this message, please do not change the subject line. Doing so may prevent us from receiving your message, and will cause you to receive a "bounced" auto-response. If you receive that "bounce" response, please resend your message by replying to this original email without changing the subject line. If you still receive an auto-response, submit a new request through our forms at <https://support.google.com/legal>.

On 04/20/17 21:51:45 lmandel@gmplaw.net wrote:

I am the attorney of record for the copyright holder in all filings with the U.S. Copyright Office and am authorized to take all necessary action to protect and enforce my client's copyrights. Please proceed to remove this violation of my client's rights. I have also spoken to the person who posted the copyrighted works without authorization and he has represented to me that he also requested that the photograph of my client's copyrighted work be removed. I do not know why that request was not honored. Thank you for your immediate attention to this matter.

Regards.

Lawrence D. Mandel

Gertner Mandel, LLC

P.O. Box 301

Lakewood, NJ 08701

Tel: (732) 363-3333

Fax: (732) 534-0328

www.iplaw-gmp.net

From: removals@google.com [mailto:removals@google.com]

Sent: Thursday, April 20, 2017 4:14 PM

To: lmandel@gmplaw.net

Subject: RE: [4-5586000017052] Your Request to Google

Hello,

Thanks for reaching out to us.

With regard to the following URL(s):

<https://www.google.com/maps/place/394+McGuinness+Blvd,+Brooklyn,+NY+11222/@40.7365404,-73.9544983,17z/data=!3m1!4b1!4m5!3m4!1s0x89c2593be62b034f:0x4934b645b2ac3f99!8m2!3d40.7365404!4d-73.9523096>

It is unclear to us whether or not you are the authorized copyright agent for the content in question. Only the copyright owner or an authorized representative can file a DMCA Infringement Notice on his/her behalf. Please note that you could be liable for damages (including costs and attorneys' fees) if you materially misrepresent that a product or activity is infringing your copyrights.

Under U.S. law, copyright in an image is generally owned by the person who created the image, unless the image was made as part of that person's responsibilities as an employee (in which case the image belongs to the employer) or that person entered into a written agreement to transfer the rights to the image to someone else. So, for example, a person who is the subject of a photograph is generally not the owner of the copyright in the photograph (unless the person has obtained the rights to the photograph, such as by written agreement).

If you still believe you are the copyright owner in this case, then please reply to this e-mail with documentation that confirms you are the rights holder for this content. Otherwise we cannot process your complaint, and you should have the copyright owner file a DMCA notice with us.

Regards,
The Google Team

When replying to this message, please do not change the subject line. Doing so may prevent us from receiving your message, and will cause you to receive a "bounced" auto-response. If you receive that "bounce" response, please resend your message by replying to this original email without changing the subject line. If you still receive an auto-response, submit a new request through our forms at <https://support.google.com/legal>.

On 04/04/17 20:31:26 lmandel@gmplaw.net wrote:

subject_lr_dmca: Your Request to Google
full_name: Lawrence Mandel
companyname: Gertner Mandel, LLC
represented_copyright_holder: Aryeh Grunewald
contact_email_noprefill: lmandel@gmplaw.net
country_residence: US
location_of_copyrighted_work: Google Maps for location at 394 McGuinness Blvd, Brooklyn, NY 11222
description_of_copyrighted_work: Photograph of copyrighted sculptures of figures holding money bags, all in white, which are part of registered collection known as "Bandit Holding Heart" under U.S. Copyright Certificate No. V Au 1-261-184
hidden_category: images
url_box:
<https://www.google.com/maps/place/394+McGuinness+Blvd,+Brooklyn,+NY+11222/@40.7365404,-73.9544983,17z/data=!3m1!4b1!4m5!3m4!1s0x89c2593be62b034f:0x4934b645b2ac3f99!8m2!3d40.7365404!4d-73.9523096>
dmca_affirmationsAuthorized: agree
dmca_affirmationsPenalty: agree1
signature: Lawrence Mandel
hidden_product: maps
hidden_ctx:
geolocation: US

:---- Automatically added fields ----:

Language: en
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auto-helpcenter-id: 1647639
auto-helpcenter-name: legal
auto-internal-helpcenter-name: legal
auto-full-url:
https://support.google.com/legal/contact/lr_dmca?dmca=images&product=maps

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auto-user-was-internal: false

IssueType: lr_dmca

form-id: lr_dmca

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AutoDetectedOS: Windows NT 10.0

MendelExperiments: 10800027,10800108,10800141,10800170

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